



THE CITY OF NEW YORK
LAW DEPARTMENT

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January 27, 2022

BY ECF

Honorable James R. Cho
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Brigid Pierce v. City of New York, et al. 21-CV-3482 (PKC)(JRC)

Your Honor:

I am a Senior Counsel in the Special Federal Litigation Division of the New York City Law Department, assigned to the defense of the above-referenced matter on behalf of defendant City of New York. I write to respectfully request that the conference scheduled for February 1, 2022 at 11:30am be adjourned to a later date. Plaintiff's counsel consents to this request. This is the first request for an adjournment of this conference.

By way of background, plaintiff alleges, *inter alia*, that on or about June 3, 2020, she was peacefully protesting when the individual officers falsely arrested her and subjected her to excessive force. On January 24, 2022, the parties filed a joint status letter outlining a dispute between the parties about the scope of the proposed confidentiality stipulation. The next day, the Court scheduled a conference for February 1 to discuss this dispute.

The undersigned will be on trial next week before the Honorable Judge Edgardo Ramos in the Southern District of New York, on the matter of Anthony Lindsey v. Detective Butler, et al., 11-CV-9102 (ER). The parties anticipate that this trial will go until at least Wednesday, February 2.

Accordingly, I am respectfully requesting that the February 1 conference before Your Honor be adjourned to the following week. Pursuant to Your Honor's rules, the parties conferred and are mutually available at any time on February 7, 8, 9, or 10.

Thank you for your consideration herein.

Respectfully submitted,

/s/

Erin Teresa Ryan
Senior Counsel
Special Federal Litigation Division

cc: All Counsel (By ECF)